

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

DAVID SIMMONS,

Plaintiff,

Case No. 2:10-cv-11857

Honorable Bernard A. Friedman

vs.

STATE FARM INSURANCE COMPANY,

Defendant.

CARL COLLINS, III (P55982)  
Attorney for Plaintiff  
18100 Meyers  
Suite 392  
Detroit, MI 48235  
(313) 341-4100

SECREST WARDLE  
NATHAN J. EDMONDS (P51453)  
Attorney for Defendant  
94 Macomb Place  
Mt. Clemens, MI 48043  
(586) 465-7180  
(586) 465-0673 (Fax)

**DEFENDANT'S WITNESS LIST**

NOW COMES Defendant, STATE FARM MUTUAL AUTOMOBILE INSURANCE COMPANY, by and through its attorneys, SECREST WARDLE, and for its list of witnesses who may be called upon at the time of trial, states as follows:

1. David Simmons  
c/o Plaintiff's counsel
2. Renae Campau  
c/o Defense counsel
3. Clifford F. Furgison, Ph.D. (*Expert*)  
5700 E. Eleven Mile Road  
Warren, MI 48091
4. Zachary Endress, M.D. (*Expert*)  
5700 E. Eleven Mile Road  
Warren, MI 48091

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5. Any and all representatives and/or records custodians of:

- a. State Farm Insurance Company
- b. Detroit Receiving Hospital
- c. Macomb Orthopedic Surgeons
- d. Kresge Eye Institute
- e. Forest Park Clinic
- f. Bio-Magnetic Imaging Center
- g. Rehab Alliance, P.C.
- h. Associated Chiropractic Clinics
- i. Liberty Mutual Ins. Co.
- j. Hanover Ins. Co.
- k. Amerisure Ins. Co.

6. Rebuttal witnesses as may be necessary.

7. All witnesses, including expert witnesses, named on Plaintiff's Witness List and Supplemental or Amended Witness List.

8. Any and all doctors who have treated Plaintiff(s) in the past or who will treat Plaintiff(s) between now and at the time of Trial.

9. All witnesses disclosed in discovery, in Answers to Interrogatories, in deposition and at Case Evaluation or otherwise.

10. Any and all police officers who investigated the accident involved in this lawsuit.

11. Any and all witnesses to the accident.

12. If the Defendant sent or will be sending Plaintiff(s) to an independent medical examination, Defendant would reserve the right to call the examining physician as a witness in this case.

13. Any and all doctors and nurses who have treated Plaintiff(s), who have taken a history from the Plaintiff(s), who have performed any tests upon the Plaintiff(s), or who have interpreted any tests performed upon the Plaintiff(s).

14. Additional experts whose areas of expertise may become relevant as issues are developed during the course of ongoing discovery and investigation.

15. Defendant reserves the right to amend its Witness List as discovery continues in this matter and witnesses become evident up to and including the time of Trial.

***SECRET WARDLE***

By: *Nathan J. Edmonds*  
NATHAN J. EDMONDS (P51453)  
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(586) 465-7180

DATED: October 1, 2010

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SECRET WARDLE

